

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

J. NOAH, B.V.,

Plaintiff,

vs.

NAVARRO GRAY, WILLIE J. MAXWELL,  
II also known as FETTYWAP doing business  
as ZOO GANG TOURING, ZOO GANG  
MUSIC, LLC doing business as ZOO GANG  
TOURING, ABC COMPANIES 1-5, and  
JOHN DOES 1-5,

Defendants.

Case No. 20-cv-20560 (SDW) (LDW)

**AFFIDAVIT**

**AFFIDAVIT PURSUANT TO LOCAL RULE 41.1(a)**

Pursuant to the Honorable Court's Notice of Call for Dismissal pursuant to local civil rule 41.1(a) dated September 23, 2021, I, Alexander J. Ginsburg, Esq., Counsel for the Plaintiff declare under penalty of perjury that the foregoing is true and correct:

1. On December 30, 2020, Plaintiff filed the instant matter via Complaint.
2. On January 21, 2021, Summons were returned executed upon all Defendants.
3. On March 18, 2021, Defendant Navarro Gray was dismissed via stipulation.
4. On June 8, 2021, Summons were returned executed upon Defendants Willie J. Maxwell, II and Zoo Gang Music, LLC.
5. On June 15, 2021, request for Default was filed by Plaintiff against Defendants Willie J. Maxwell, II and Zoo Gang Music, LLC.
6. On June 17, 2021, entry of Default was entered against Defendants Willie J. Maxwell, II and Zoo Gang Music, LLC.

7. Following the entry of Default, Plaintiff, with the assistance of counsel required time to determine and calculate the extent of damages to be assessed via default judgment.
8. The delay was in good faith and not done in an effort to delay resolution of the matter.
9. On September 24, 2021, motion for default judgment was filed by Plaintiff against Defendants Willie J. Maxwell, II and Zoo Gang Music, LLC.
10. On September 28, 2021, this Honorable Court set deadlines as to the Motion for Default Judgment, wherein a deadline for responses was set for October 18, 2021. The motion shall be decided on the papers.
11. Plaintiff now awaits the Court's decision on the aforesaid Motion for Default Judgment.
12. Plaintiff respectfully requests that the matter not be dismissed so that the Court may issue an Order for Default Judgment.

I, Alexander J. Ginsburg, Esq., counsel for the Plaintiff, declare under penalty of perjury that the foregoing is true and correct:

By: Alexander J. Ginsburg  
ALEXANDER J. GINSBURG

Executed on October 5, 2021.